UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

IN RE REVANCE THERAPEUTICS, INC. SECURITIES LITIGATION

C.A. No. 3:25-cv-0018-EJR

JOINT STIPULATION AND ORDER EXTENDING DEADLINES FOR <u>FILING</u> CONSOLIDATED COMPLAINT AND FILING MOTIONS TO DISMISS

The parties, subject to the approval of the Court, hereby stipulate as follows:

WHEREAS, this case is governed by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), which sets a procedure for a court to appoint a lead plaintiff and lead counsel in a putative class action under the Exchange Act after a press release notice is issued (15 U.S.C. § 78u-4(a)(3));

WHEREAS, on March 20, 2025, the Court granted the motion of the Institutional Investors to serve as lead plaintiff ("Lead Plaintiff") in this action (ECF 34, the "Lead Plaintiff Order");

WHEREAS, on application of the parties, the Court suspended Defendants' time to respond to the complaint pending the appointment of a lead plaintiff (ECF 17);

WHEREAS, Lead Plaintiff has determined to draft and file a consolidated complaint ("Consolidated Complaint");

WHEREAS, Defendants expect they will move to dismiss the Consolidated Complaint;

WHEREAS, the parties previously conferred and agreed on a schedule for the filing of the Consolidated Complaint, Defendants' time to respond, and the briefing on any motions to dismiss, which was reflected in their Stipulation filed with the Court (ECF 38);

WHEREAS, Lead Plaintiff represents that its factual investigation of the claims is ongoing, and Lead Plaintiff believes a brief extension of time will allow it to gather the necessary information and present a well-informed pleading, and will therefore promote the interests of justice and judicial economy;

WHEREAS, the parties have further conferred and agreed, subject to Court approval, to a short extension of thirteen days for Lead Plaintiff to file the Consolidated Complaint to allow time for the ongoing investigation and to accommodate the schedule of counsel;

WHEREAS, the modified schedule will not change the date on which any motions to dismiss will be fully briefed as reflected in the following table;

Event	Deadline Per ECF 38	Agreed New Deadline
Consolidated Complaint Due	June 5, 2025	June 18, 2025
Answer or Motion Due	August 15, 2025	August 28, 2025
Opposition Due	October 24, 2025	October 24, 2025
Reply Due	December 5, 2025	December 5, 2025

NOW, THEREFORE, the parties hereby stipulate and agree, subject to the approval of the Court, as follows:

- Lead Plaintiff shall file the Consolidated Complaint on or before June 18, 2025; 1.
- 2. Defendants shall answer or otherwise respond to the Consolidated Complaint on or before August 28, 2025;
- 3. Lead Plaintiff shall file opposition to any motions to dismiss the Consolidated Complaint on or before October 24, 2025;
- Defendants shall file replies in further support of any motions to dismiss on or 4. before December 5, 2025.

SO ORDERED this 2nd day of June, 2025.

The Honorable Jeffery S. Frensley United States Magistrate Judge

STIPULATED AND AGREED BY:

STRANCH, JENNINS & GARVEY PLLC

/s/ J. Gerard Stranch, IV

J. Gerard Stranch, IV (BPR 23045) The Freedom Center 223 Rosa L. Parks Avenue Suite 200 Nashville, TN 37203 Tel.: (615) 254-8801 gstranch@stranchlaw.com

Liaison Counsel for Lead Plaintiff and the Putative Class

ENTWISTLE & CAPPUCCI LLP

Vincent R. Cappucci (pro hac vice) Robert N. Cappucci (pro hac vice) Brendan J. Brodeur (pro hac vice) 230 Park Avenue, 3rd Floor New York, NY 10169 Tel.: (212) 894-7200 Fax: (212) 894-7272 vcappucci@entwistle-law.com rcappucci@entwistle-law.com bbrodeur@entwistle-law.com

-and-

ENTWISTLE & CAPPUCCI LLP

Andrew J. Entwistle (pro hac vice) Callie D. Crispin (pro hac vice) 500 West 2nd Street, Suite 1900 Austin, TX 78701 Tel.: (512) 710-5960 Fax: (212) 894-7278

aentwistle@entwistle-law.com ccrispin@entwistle-law.com

SAXENA WHITE P.A.

David J. Schwartz (*pro hac vice* forthcoming) Marco A. Dueñas (pro hac vice forthcoming) 10 Bank Street, Suite 882 White Plains, NY 10606

BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, PC

/s/ Christopher E. Thorsen

Christopher E. Thorsen (BPR 21049) 1600 West End Avenue, Suite 2000 Nashville, Tennessee 37203 (615) 726-5600 cthorsen@bakerdonelson.com

SKADDEN, ARPS, SLATE, **MEAGHER & FLOM LLP**

Susan L. Saltzstein (pro hac vice) Jeffrey S. Geier (pro hac vice) Christopher R. Fredmonski (pro hac vice) One Manhattan West New York, New York 10001 (212) 735-3000 susan.saltzstein@skadden.com jeffrey.geier@skadden.com christopher.fredmonski@skadden.com

SKADDEN, ARPS, SLATE, **MEAGHER & FLOM LLP**

Jenness E. Parker (pro hac vice) One Rodney Square 920 N. King St. Wilmington, Delaware 19801 (302) 651-3000 jenness.parker@skadden.com

Counsel for Defendants Mark J. Foley and Tobin C. Shilke

/s/ Milton S. McGee, III

RILEY & JACOBSON, PLC Milton S. McGee, III (BPR 024150) 1960 West End Avenue Nashville, TN 37203

(615) 320-3700 tmcgee@rjfirm.com Tel.: (914) 437-8551 Fax: (888) 631-3611 dschwartz@saxenawhite.com mduenas@saxenawhite.com

Lead Counsel for Lead Plaintiff and the Putative Class

KIRKLAND & ELLIS LLP

Jordan D. Peterson, P.C. (pro hac vice) 601 Lexington Avenue New York, NY 10022 (212) 446-4800 jordan.peterson@kirkland.com

Counsel for Defendant Revance Therapeutics, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2025, I electronically filed a copy of the foregoing *Joint Stipulation and [Proposed] Order Extending Deadlines for Filing Consolidated Complaint and Filing Motions To Dismiss* with the Clerk of the District Court using the CM/ECF system, which will send notification of such filing to all parties registered with the Court's electronic filing system.

/s/ J. Gerard Stranch, IV
J. Gerard Stranch, IV